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6 ACTION MOTORSPOORTS OF TAHOE, INC.
7 (improperly named as ACTION WATERSPORTS
8 OF TAHOE)

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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 SUZANNE NAVONE,

14 Plaintiff,

15 v.

16 ACTION WATERSPORTS OF TAHOE, CAMP
17 RICHARDSON RESORT, INC., M/V ROE
18 (A.K.A. M/V WATER TAXI), its engines,
19 tackle, equipment, furnishings, and machinery,
20 *in rem*, and MARK TAYLOR, JAMES
21 GRAHAM, *individuals* and Does 1-20,

22 Defendants.

23 Case No. 2:20-cv-01351-JAM-JDP

24 **STIPULATION TO EXTEND TIME FOR
25 DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT; ORDER**

26 Complaint Filed: July 6, 2020
27 Trial Date: TBD

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30 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
31 attorneys that Defendant ACTION MOTORSPOORTS OF TAHOE, INC. (improperly named as Action
32 Watersports of Tahoe), may have additional time of 28 days within which to answer or otherwise
33 respond to Plaintiff SUZANNE NAVONE's Complaint. Therefore, the last day for Defendant to
34 answer or otherwise respond to Plaintiff's Complaint is September 22, 2023. If the Court grants this
35 extension, the date would be October 27, 2022.

36 Good cause exists for this extension as defense counsel has just been assigned to this case and
37 requires time to become knowledgeable about the case to prepare an initial pleading or response.

This document is being electronically filed through the Court's ECF System. In this regard, counsel for Defendant hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this concurrence is available for inspection or production if so ordered.

Respectfully submitted,

DATED: September 22, 2023

KENNEDYS CMK LLP

By: /s/ Pamela L. Schultz
PAMELA L. SCHULTZ
Attorneys for Defendant
ACTION MOTORSPORTS OF TAHOE, INC.

DATED: September 20, 2023

BIRNBERG & ASSOCIATES

By: /s/ Cory A. Birnberg (as authorized on 9/20/23)
CORY A. BIRNBERG
Attorneys for Plaintiff
SUZANNE NAVONE

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendant should answer or otherwise respond to Plaintiff's Complaint on or before **October 27, 2023**.

Dated: September 28, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE